

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MARTIN J. WALSH,)	
SECRETARY OF LABOR,)	
UNITED STATES DEPARTMENT OF LABOR,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 19-cv-496-CCW
)	
FUSION JAPANESE STEAKHOUSE, INC.,)	
FUSION JAPANESE STEAKHOUSE, INC.,)	
Z&S INTERNATIONAL CUISINE, INC.,)	
YUAN ZHENG XIAO, and CHRISTINE XIAO,)	
)	
Defendants.)	
)	

MOTION TO APPROVE AND ENTER CONSENT JUDGMENT

Plaintiff hereby moves this Court to Approve and Enter the Consent Judgment against Defendants, as agreed to by the parties. In support thereof, Plaintiff represents that the parties have reached an agreement to settle this matter. The terms of this agreement are set forth in the Consent Judgment attached hereto as Exhibit A, which has been signed by Defendants.

WHEREFORE, for the reasons set forth above, the Secretary respectfully requests that the Court enter the Consent Judgment attached hereto.

Respectfully submitted,

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UNITED STATES DEPARTMENT OF LABOR

Seema Nanda
Solicitor of Labor

Oscar L. Hampton III
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/s/ Brian P. Krier
By: Brian P. Krier
PA ID No. 313826
Senior Trial Attorney

Edwin M. Ferguson
Trial Attorney
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CERTIFICATE OF SERVICE

I certify that on March 16, 2022, I electronically filed the foregoing *Motion to Approve and Enter Consent Judgment* with the Clerk of Court by using the CM/ECF system, which will provide notice and an electronic link to this document to all attorneys of record.

/s/ Brian P. Krier
By: Brian P. Krier